

March 9, 2000

VIA EXPRESS DELIVERY

Donna M. Caton
Chief Clerk
ILLINOIS COMMERCE COMMISSION
527 E. Capitol Avenue
Springfield, IL 62794-9280

**Re: Rhythms Links, Inc. Response to Ameritech's March 1, 2000 filing of its
Operational Support System ("OSS") Revised Plan of Record**

Dear Ms. Caton:

Rhythms Links, Inc. ("Rhythms") respectfully submits this response to the Operational Support System ("OSS") Revised Plan of Record ("POR") that Ameritech filed with the Illinois Commerce Commission ("Commission") on March 1, 2000.

Ameritech's filing is in response to the Commission order on February 15, 2000 that rejected SBC/Ameritech's initial Plan of Record for Operations Support Systems (OSS). It was clear at that time that the company's promises were too vague and thus did not meet the company's OSS commitments made to obtain approval of the SBC/Ameritech merger. The latest filing contains many of the same vague commitments contained in the original version of the POR filed on January 7. Furthermore, Rhythms is disappointed that Ameritech continues to insist that Illinois accept delay of the installation of effective OSS interfaces that are already in place in other SBC states.

As discussed more fully below, Rhythms recommends that the Commission either direct Ameritech to accelerate the implementation of certain commitments or order that the acceptance of that document at this time should not be construed as binding parties to what Ameritech has offered in that document. Rather, the OSS enhancement, integration, deployment and testing process should be subject to further review by this Commission in the event that Ameritech continues to unduly restrict the collaborative process.

Rhythms' primary concern with the Revised POR is that the proposed timelines leave the implementation of effective OSS too far out in the future. Rhythms is interested in Ameritech's schedule for adoption of enhancements to both its Electronic Data Interchange (EDI) and Graphical User Interface ("GUI") interfaces to be used for provisioning, pre-ordering and ordering. With regard to GUI interfaces, Ameritech's Revised POR's response is to offer Illinois an enhanced version of Verigate and LEX, which are already being utilized in the SWBT and Pacific Bell and Nevada Bell regions. Depending upon the nature of those enhancements, this

may be a worthwhile offer. Ameritech reduces the value of that offer, however, by indicating that it will not install these new interfaces until March 2001. That delay is too long to wait for systems that may or may not be significantly better than systems already in place in Illinois. Along the same lines, Ameritech indicates that it will not provide an enhanced version of the Common Object Request Broker Architecture ("CORBA") protocol as an alternative to EDI until March 2001. The CORBA interface is currently available in other states.

Rhythms therefore requests that the Commission should direct that Ameritech accelerate the implementation of its improved OSS systems, particularly the enhanced version of Verigate and LEX applications, to an earlier date. Rhythms suggests September 1, 2000. In the alternative, the Commission should indicate that the acceptance of the POR does not preclude CLECs from objecting to Ameritech's implementation of the Revised POR and raising issues in the collaborative process and requesting this Commission's resolution of disputes, including issues relating to the timing of Ameritech's revisions to its OSS.

Rhythms also takes issue with the lack of detail on Ameritech's plans for complying with the FCC's UNE Remand Order (Third Report and Order and Fourth Further Notice of Proposed Rulemaking in Docket No. 96-98). In the UNE Remand Order, the FCC required incumbent LECs to provide competitors with nondiscriminatory access to loop qualification information, including the same detailed information about the loop that is available to the incumbent. At a minimum, an incumbent LEC must provide requesting carriers with the same underlying information that the incumbent LEC has in any of its own databases or other internal records. UNE Remand Order at paras. 426-27. As a result, Ameritech is required to provide CLECs with real-time, mechanized access to all records, databases, and back-end systems available to Ameritech's own personnel, including LFACs (SBC's primary loop assignment and tracking system). Such information should include aggregate planning data such as percentage of digital loop carrier (DLC) at each wire center. Ameritech's POR does not discuss access to such records, databases and back-end systems.

Finally, the POR continues to lack adequate detail on Ameritech's plans for modifying its OSS interfaces to allow ordering of line sharing, consistent with the FCC's Line Sharing Order (Third Report and Order in Docket 98-147 and Fourth Report and Order in Docket 96-98). Despite the requirement that line sharing be implemented by June 6, Ameritech has not provided specific information on the modifications that it will make to its interfaces to accommodate line sharing. In the line sharing trial currently underway in Illinois and other SBC states, Rhythms has found the systems currently available in Illinois to be wholly inadequate. For example, it currently takes Ameritech three days to provide loop qualification information via TCNet. The Commission should require Ameritech to provide more detail on its plans for complying with the line sharing mandate.

Very truly yours,

Stephen J. Moore

Enclosures

cc: Chairman Mathias
Commissioner Harvill
Commissioner Hurley
Commissioner Kretschmer
Patrick E. McLarney
Frank Bodine
Sam McClerren
Nancy Atkinson
G. Darryl Reed
Thomas G. Aridas